



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 1**  
**5 Post Office Square, Suite 100**  
**Boston, MA 02109-3912**

**Memorandum**

**Date:** February 21, 2013

**Subject:** Release of documents previously determined to be confidential

**To:** File

**From:** Dan Wainberg, Acting Section Chief, RCRA Corrective Action

*[Handwritten signature]* 2/21/13

Three documents previously determined to be confidential were reviewed and have been determined to be releasable. The three documents include:

1. RCRA Prioritization System Scoring Summary
2. Memorandum from John Podgurski dated July 12, 1993 with the subject, "Environmental Benefits review outcome for Synthetic Products Co, CTD001179688"
3. Memorandum from Anni Loughlin dated September 18, 1992 with the subject, "Final Confidential NCAPS Data Input Package Comments, Synthetic Products, Stratford, CT, CTDOO1179688"

These documents were originally held as pre-decisional confidential because the information they contained was factored into prioritizing and determining whether to issue orders at RCRA Corrective Action sites.



National Service Center for Environmental Publications (NSCEP)

## Document Display

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Office of Solid Waste

Solid Waste and  
Emergency Response  
(OS-305)EPA 330-F-92-027  
January 1993

## Environmental Fact Sheet

### The National Corrective Action Prioritization System

#### Corrective Action: A Background

In 1984, Congress amended the Resource Conservation and Recovery Act (RCRA), and provided EPA with broad new authorities to require clean-up, or "corrective action", at hazardous waste management facilities. Corrective action can involve a wide variety of activities, including cleanup of contaminated environmental media such as soils and ground water, treatment of the sources of contamination, and actions to control or prevent exposure to contamination. EPA can require corrective action at facilities that have RCRA permits as well as at facilities that are operating under "interim status."

#### Setting Priorities

Currently, there are approximately 4,300 facilities that treat, store, or dispose of hazardous wastes, which can be compelled to take corrective action when necessary. Some facilities are very large and have extensive contamination problems which rival the largest Superfund sites. Other facilities have relatively minor environmental problems. Still others will not need remedial action at all. Given this diversity, the large number of RCRA facilities, and the technical complexities of remediation, EPA and the States

must set priorities in deciding which facilities should receive attention, and when.

#### What is NCAPS?

It is EPA's policy to compel corrective action at the "worst sites first." As a result, the Agency has developed a system for assessing the relative environmental cleanup priority of RCRA facilities, called the National Corrective Action Prioritization System (NCAPS). This system is intended to provide a nationally consistent approach to assessing site factors that drive cleanup priority decisions.

NCAPS is a computer-based system that considers a variety of environmental factors in assessing the priority of sites, such as the types and volumes of wastes present, contaminant release pathways, and the potential for exposure to contaminants by humans and ecosystems. In this sense, the system is similar to the Hazard Ranking System (HRS) used by the Superfund program. However, NCAPS is designed to be a less resource intensive system to use, and provides priority rankings with less site data than is normally required for HRS scoring.

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CONFIDENTIAL

RCRA PRIORITIZATION SYSTEM SCORING SUMMARY

FOR

SYNTHETIC PROD. CO.

EPA SITE NUMBER: CTD001179688

STRATFORD, CT

SCORED BY: TARA ABBOTT TAFT  
OF CDM FEDERAL PROGRAMS CORP

ON 09/01/92

RCRA RECORDS CENTER  
FACILITY *Flow Polymeric*  
I.D. NO. *CTD001179688*  
FILE LOC. *R-5*  
OTHER \_\_\_\_\_

GROUNDWATER SCORE	:	23.76
SURFACE WATER SCORE:		20.04
AIR ROUTE SCORE	:	7.34
ONSITE SCORE	:	5.14
-----		
MIGRATION SCORE	:	16.17

WS-1 GROUNDWATER ROUTE

IS THERE AN OBSERVED RELEASE? N

ROUTE CHARACTERISTICS

DEPTH TO AQUIFER (FT.) : 10

NET PRECIPITATION (IN.) : 18

PHYSICAL STATE: LIQUID, GAS, SLUDGE

CONTAINMENT: FAIR

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: LEAD

TOXICITY/PERSISTENCE VALUE: 18

QUANTITY KNOWN? YES

CUBIC YARDS OR TONS:	0
DRUMS :	40

TARGETS

GROUNDWATER USE: POSSIBLE DRINKING WATER

DISTANCE TO WELL (MILES): 2.0

WS-2 SURFACE WATER ROUTE

RELEASES

IS THERE AN OBSERVED RELEASE? N  
IS THERE A PERMITTED OUTFALL? N  
HAVE THERE BEEN PERMIT VIOLATIONS? N

ROUTE CHARACTERISTICS

FACILITY LOCATION: OTHER  
24-HOUR RAINFALL: 2.5  
DISTANCE TO SURFACE WATER (MILES): 0.70  
PHYSICAL STATE: LIQUID, GAS, SLUDGE

CONTAINMENT: FAIR

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: LEAD  
TOXICITY/PERSISTENCE VALUE: 18  
QUANTITY KNOWN? YES

CUBIC YARDS OR TONS: 0  
DRUMS : 40

TARGETS

SURFACE WATER USE: POSSIBLE DRINKING WATER OR RECREATION  
DISTANCE TO INTAKE OR CONTACT POINT (MILES): 0.7  
DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 0.7



WS-3 AIR ROUTE

RELEASES

IS THERE AN OBSERVED, UNPERMITTED, ON-GOING RELEASE? N

DOES THE FACILITY HAVE AN AIR OPERATING PERMIT(S)? N

HAVE THERE BEEN ANY PERMIT VIOLATIONS OR ODOR COMPLAINTS BY RESIDENTS? N

CAN CONTAMINANTS MIGRATE INTO AIR? Y

CONTAINMENT: FAIR

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: LEAD

TOXICITY/PERSISTENCE VALUE: 3

QUANTITY KNOWN? YES

CUBIC YARDS OR TONS:	0
DRUMS :	40

TARGETS

POPULATION: RESIDENCES ARE LOCATED WITHIN FOUR MILES

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 0.7

WS-4 ON SITE CONTAMINATION

ACCESS TO SITE: LIMITED ACCESS

IS THERE AN OBSERVED SURFACE SOIL CONTAMINATION? N

CONTAINMENT: FAIR

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: LEAD

TOXICITY/PERSISTENCE VALUE: 3

TARGETS

DISTANCE TO RESIDENTIAL AREAS (MILES): 0.10

IS THERE AN ON-SITE SENSITIVE ENVIRONMENT: N

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
J.F. KENNEDY FEDERAL BUILDING, BOSTON, MA 02203-2211

MEMORANDUM

DATE: July 12, 1993

SUBJ: Environmental Benefits review outcome for Synthetic Products Co  
CTD001179688

FROM: John Podgurski, Chief  
CT Waste Regulation Section

TO: File



RCRA RECORDS CENTER  
FACILITY *Flow Polymers*  
I.D. NO. *CTD001179688*  
FILE LOC. *RS*  
OTHER \_\_\_\_\_

On June 28, 1993 Synthetic Products Co, underwent an environmental benefit review to complete determination of the facility's environmental priority. Based on this environmental benefit review the environmental priority of the facility is **LOW**.

The NCAPS based environmental significance category of **LOW** for this site was adopted as the environmental priority of the facility.

The NCAPS based environmental significance was adopted as the facility's environmental priority because the environmental benefit review found no factors to warrant assigning an overall environmental priority different than the environmental significance of the facility.

To my knowledge this is the first environmental benefit review of this project.

cc: Larry Brill  
David Webster  
State Coordinator  
Ernest Waterman



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TO: File



CONFIDENTIAL

RCRA RECORDS CENTER  
FACILITY *Flow Polymers*  
I.D. NO. *CTD001179688*  
FILE LOC. *R-5*  
OTHER \_\_\_\_\_

On June 28, 1993 Synthetic Products Co, underwent an environmental benefit review to complete determination of the facility's environmental priority. Based on this environmental benefit review the environmental priority of the facility is LOW.

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The NCAPS based environmental significance was adopted as the facility's environmental priority because the environmental benefit review found no factors to warrant assigning an overall environmental priority different than the environmental significance of the facility.

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David Webster  
State Coordinator  
Ernest Waterman

U.S. ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
J.F.K. FEDERAL BUILDING, BOSTON, MA 02203-2211

MEMORANDUM

DATE: September 18, 1992

SUBJECT: Final Confidential NCAPS Data Input Package Comments  
Synthetic Products  
Stratford, CT  
CTD001179688

FROM: Anni Loughlin  
Solid Waste & GIS Section

TO: Ernest Waterman  
ME, NH, & VT Waste Regulation Section

The following is a listing of comments on the draft NCAPS Data Input Package that were not addressed in the final version.

Page 4: The size for AOC #1 should be 3300 gallons, the maximum historical capacity.

The size for AOC #3 should be 1 55-gallon drum.

The size for AOC #4 should be 30' X 30'.

Page 5: Oily waste should be indicated on Worksheet #2 for AOC #2.

Lead oxide, cadmium, chromium, and zinc should be listed for AOC #4 on Worksheet #2.

Page 7: Depth to groundwater is unknown.

Page 15: There are no public wells within a four mile radius, however, the locations of private wells are unknown. Based on the large number of people with private wells in the area, 2-3 miles is probably not a very conservative estimate.

Page 19: There are storm drains on-site, which discharge directly to Johnson Creek, 1.3 miles away. The closest body of surface water is Selby Pond, which is 0.7 miles away.

Page 35: The waste quantities for AOCs with only "Good" storage have not been taken into consideration here. The waste quantity should be the same as previously reported - about 30-40 drums, not including the combined 4,000 gallons of raw product oil stored in tanks. Up to 60 drums have been stored in the drum storage area in the past (based on information on page 9 of the draft PA-Plus).

RCRA RECORDS CENTER  
FACILITY Flow Polymers  
I.D. NO. CTD001179688  
FILE LOC. R5  
OTHER \_\_\_\_\_



U.S. ENVIRONMENTAL PROTECTION AGENCY  
REGION I

rec'd  
9/8/92

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)  
DATA INPUT FORMS FOR SUMMARY MODEL

Facility Name:	Synthetic Products		
EPA ID#:	CTD0001179688		
Address:	1525 Stratford Avenue		
	Stratford, CT	06497	
Facility Contact:	James Kalanta	Title:	Envir Mgr
		Phone:	203/377-5550

Analyst Name:	Erik Bankay	Title:	Hydrogeologist
Organization:	TRCC		
Phone:	508/970-5600	Date:	6-10-92

**DRAFT**  
**CONFIDENTIAL**



## REFERENCES

Please provide the name and date (and pages, if appropriate) of each document used to complete this booklet.

No.   Reference

1

references attached

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Ref #  
in NCAPS  
Form  
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CTDEP, 1989a. Letter from George Dews, HWMS, CTDEP, to James Kanlanta, Environmental Manager, Synthetic, January 6, 1989.

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EPA, 1980a. Initial Notification of Hazardous Waste Activity Form filed with the EPA, August 14, 1980.

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EPA 1982a. RCRA Inspection Report, conducted by Dan Granz and Steve Magion, February 4, 1982.

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EPA 1988a. Letter from Merrill Hohman, Director Waste Management Division, EPA to James Kalanta, Environmental Manager, Synthetic, January 12, 1988.

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**WORKSHEET #1**  
**Facility Unit Identification**

List each specific unit at the site, its size, and condition of containment. Use this worksheet to identify the site's specific units and to select the worst containment level for each unit and for each pathway. Within the selected condition of containment, assign GW for the groundwater route, SW for the surface water route, AR for the air route, and OS for the on-site route. The worst conditions will be entered on the data sheets for each route.

Area or Unit #	Area or Unit Name & Description	Size	Condition of Containment				Ref #
			Very Good	Good	Fair	Poor	
1	Barrel Storage Area	30 bbl			GW SW OS		
2	Mixing Room	20'x30'		AR	GW SW OS		
3	Kerosene Storage Area	open area			GW SW AR OS		
4	Roll Mill Area	30'x20'		AR	GW SW OS		
5	Raw Product Oil Tanks	2-1,000 gallon		AR	GW SW OS		
6	Raw Product Oil Tank	2,000 gallon		GW SW AR OS			
7							
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**WORKSHEET #2**  
**Unit Contents**

Use this worksheet to check off the specific chemicals found at each unit. Refer to areas or units by number based on Worksheet #1. If specific chemicals have not been identified, use chemical groups.

Chemical Name or Waste Type	Area or Unit #														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Raw Product Oils					X										
Vinyl Silane						X									
Lead-based Material & Powders	X	X		X											
Lead Oxide	X	X													
Cadmium	X	X													
Chromium	X	X													
Zinc	X	X													
Sludge (Kerosene Sludge)	X		X												
Oily Waste	X														
Solvents															
Pesticides															
Other Organic Chemicals															
Inorganic Chemicals															
Acids															
Bases															
Heavy Metals															

GROUNDWATER ROUTE  
Instructions & Sources  
First Page

A. Observed Release

\*1. Is There an Observed Release?

Yes, if there is documented groundwater contamination above background levels or above the drinking water maximum contaminant level (MCL); or No, if there is no documentation or indication of a release; Possible, if groundwater quality data or the site visit lead you to believe a release to the groundwater may have taken place (e.g., unlined lagoon, spill residue on ground, underground storage tank with no groundwater monitoring system, or subsurface/surface soil contamination). Documentation may include analytical evidence, or a report by a regulatory agency or by a facility employee stating that a release has occurred.

Sources (circle): Monitoring Reports; Site Visit; 3007 Response; Water Compliance Monitoring Files; Site Inspections; Spill Reports.  
Comment and other source (date): none, 1, 2

B. Route Characteristics

\*1. Depth to Aquifer

Enter the depth from ground surface to the aquifer beneath the site (in feet).

Sources (circle): Monitoring Reports; Inspection Reports; Part B.  
Comment and other source (date): unknown

2. Net Precipitation

Subtract mean annual lake evaporation from the normal annual total precipitation in order to obtain the average net precipitation for the area.

Sources (circle): See Appendix B.  
Comment and other source (date): Climatic Atlas of the U.S.

3. Physical State

Evaluate the physical state of the waste most likely to impact the groundwater in the event of a release. Consider the volume, condition and content and select the least stable physical state of the wastes on site:

stable solid  
unstable solid  
powder, ash  
liquid, gas, sludge

Sources (circle): Site Visit; Inspection Reports; Part A.  
Comment and other source (date): 1, 2

GROUNDWATER ROUTE  
Data & Comments  
First Page

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A. Observed Releases

1. Is there an observed release? (circle one):

Yes

No

Possible

☐ ☐

Comments:

No information from site reconnaissance or file review that indicates a release

B. Route Characteristics

1. Depth to Aquifer (feet): unknown

☐ ☐

2. Net Precipitation (inches): 18.49

☐ ☒

3. Physical State (check one):

☐ ☐

☐

Stable Solid (most stable)

☐

Unstable Solid

☒

Powder, Ash

☒

Liquid, Gas, Sludge (least stable)

Comments:



GROUNDWATER ROUTE  
Instructions & Sources  
Second Page

C. Containment

- \*1. Containment is a measure of the physical barriers in place to inhibit a waste from entering the groundwater pathway either now or in the past. Do not consider natural barriers (e.g., an underlying clay layer) when evaluating containment criteria. If there are multiple SWMUs, select the SWMU with the worst containment level. Interpret the descriptions in site reports or similar documents, using the following criteria as guidelines:

<u>Unit</u>	<u>Migration/Potential</u>	<u>Score</u>
Sealed Container/Tank	Sound Secondary Containment	Very Good
Sealed Container/Tank	Unsound Secondary Containment	Good
Leaky Container/Tank	Sound Secondary Containment	Good
Underground Storage Tank	Tank Integrity Unknown	Good
Sealed Container/Tank	No Secondary Containment	Fair
Leaky Container/Tank	Unsound Secondary Containment	Fair
Leaky Container/Tank	No Secondary Containment	Poor
Land-based Unit		Poor

Unit scored (include description and dates in use); use *Worksheet #1*:

AOC #1, Barrel Storage Area

Sources (circle) Inspection Reports Water Compliance Reports Site Visit 3007 Response.  
Comment and other source (date): 1, 2

GROUNDWATER ROUTE  
Data & Comments  
Second Page

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C. Containment (check one):

- ☐ Very Good  
☐ Good  
☒ Fair  
☐ Poor

Comments:

The barrels were in good condition on a concrete floor,  
however, there was no berm or other secondary containment.  
Staining on the floor was noted also.

**GROUNDWATER ROUTE**  
Instructions & Sources  
Third Page

**D. Waste Characteristics**

**1. Chemical Name and/or RCRA Waste Code Number**

Enter the one chemical or waste code of most concern (for the groundwater route) as defined by the chemical with the highest Sax toxicity rating, as found in Appendix A. Use *Worksheet #3* to determine toxicity/persistence for each chemical of concern for the groundwater route (included in Worksheet #2). Do not consider concentrations of contaminants.

Sources (circle): For determining contaminants of concern: Site Visit, Groundwater Analytical Data. For determining most toxic compound: See Appendix A.  
Comment and other source (date): 1, 2

**2. Toxicity/Persistence**

Value for the chemical or waste of concern. This contaminant should be at a SWMU that has a containment score less than "VERY GOOD". Refer to *Worksheet #3*.

Sources (circle): See Appendix A  
Comment and other source (date): \_\_\_\_\_

**WORKSHEET #3**

**Chemical Toxicity/Persistence Values for Groundwater and Surface Water Routes**

Identify and list each chemical at the site which has the potential to migrate to the groundwater or surface water routes. List the RCRA waste code and CAS number, if known. Obtain toxicity/persistence values from Appendix A for each chemical. Use the worksheet to select the chemical with the highest toxicity/persistence value (0-18) and enter its name and value in the Waste Characteristics section for the groundwater and surface water routes. Note in comments if toxicity/persistence information was not available.

CAS #	Chemical Name and/or Waste Code	toxicity/persistence 0-18	GW or SW
	Lead-based powders (DOOB)	18	GW/SW
	Lead oxide, cadmium, chromium,	18	GW/SW
	Zinc	12	GW/SW
	Raw Product Oils	—	GW/SW
	Vinyl Silane	—	GW/SW

GROUNDWATER ROUTE  
Data & Comments  
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D. Waste Characteristics

1. Chemical Name and/or RCRA Waste Code Number:

Lead based powder (D008)

2. Toxicity/Persistence Value (circle one):

0    3    6    9    12    15    18

Comments:

☒ ☐  
☒ ☐



GROUNDWATER ROUTE  
Instructions & Sources  
Fourth Page

•3. Waste Quantity

Report wastes for units only if containment is other than "VERY GOOD." If Containment is "VERY GOOD" for all units, waste quantity equals zero.

If quantity is known, convert data to a common unit: assume 1 ton = 1 cubic yard = 4 drums. For the purpose of converting bulk storage, assume 1 drum = 50 gallons. Enter waste quantity in cubic yards, tons or drums.

If quantity is unknown, estimate waste quantity using the following criteria:

< 10 yd <sup>3</sup> (or < 40 drums)	small
100 - 1,000 yd <sup>3</sup> (or 400 - 4,000 drums)	large
> 1,000 yd <sup>3</sup> (or > 4,000 drums)	large storage or disposal areas

If the site has multiple SWMUs, combine all waste quantities for SWMUs capable of migrating to groundwater (containment scores less than "VERY GOOD"). Use *Worksheet #1* to assist in combining waste quantities.

Sources (circle): Part A; Tank Capacities; Permitted Drum Storage Capacity; Inspection Reports; 3007 Response; Annual Reports; Part B.  
Comment and other source (date): \_\_\_\_\_



GROUNDWATER ROUTE  
Data & Comments  
Fourth Page

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3. Quantity Known (circle one)?

☒ Yes

☐ No

If Yes, enter actual amount:

30-40 cubic yards or tons  
drums

If No, check one:

- ☐ Is amount likely to be small?
- ☐ Is amount likely to be large?
- ☐ Are large storage or disposal areas present?

Comments:

Up to 60 drums have been stored in the Barrel Storage Area.  
This quantity does not include the combined 4,000 gallons  
of raw product oil stored in above ground tanks.

GROUNDWATER ROUTE  
Instructions & Sources  
Fifth Page

E. Targets

\*1 Groundwater Use

Options are given in order from the most critical (Drinking Water) to the least critical (Not Impacted). Check the most critical groundwater use that occurs within 3 miles of the site. "Drinking Water" indicates that the groundwater was previously used, is presently used, or is likely to be used in the future for drinking water. If drinking water use is not documented, check Possible Drinking Water, unless specific information refutes this possibility (for example, industrial use of unusable aquifer due to low yield).

If you can verify that none of these uses apply, then check:

Quality Impacted, if there is an observed release.

Quality Not Impacted, if there is no observed release.

Source (circle): Monitoring Report, GIS, Local Water Department.

Comment and other source (date): \_\_\_\_\_

\*2. Distance to Intake

Distance (in miles) to the nearest drinking water well within 3 miles of the facility. If unknown, use distance between hazardous substance and nearest residence where groundwater may be used for drinking water. If the use of the groundwater is unknown ("Possible Drinking Water"), "Quality Impacted," or "Quality Not Impacted," assign "2 to 3 miles" for the distance. If the groundwater flow direction is known, do not consider upgradient wells as receptors.

Source (circle): GIS; USGS Topographic Map or Site Map; Site Visit; Part A; State Atlas.

Comment and other source (date): \_\_\_\_\_

GROUNDWATER ROUTE  
Data & Comments  
Fifth Page

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E. Targets

1. Groundwater Use (check only *one*):

- ☐ Drinking Water  
☒ Possible Drinking Water  
☐ Agriculture or Industrial

- ☐ Quality Impacted  
☐ Quality Not Impacted

2. Distance to intake (to the nearest  $\frac{1}{2}$  mile): 2-3

Comments:

The distance to the nearest intake is unknown.



SURFACE WATER ROUTE  
Instructions & Sources  
First Page

The surface water pathway is assessed to determine whether contaminated runoff has reached surface water or if site characteristics make a release to surface water likely.

A. Observed Release

- \*1. Yes, if there is a evidence of a direct discharge of contaminants to surface water; No, otherwise. A direct discharge can include such events as spills, runoff from contaminated soils, or discharge of contaminated groundwater. Documentation may include analytical evidence, a report by a regulatory agency or by a facility employee stating that a release has occurred.

Sources (circle): Site Visit Monitoring Reports; 3007 Response.  
Comment and other source (date): 1/2

B. Likelihood of Release

1a. Permitted Outfall

Yes, if there is a permitted outfall; No, if there is not.

Sources (circle): Department of Environmental Protection; EPA Files  
Comment and other source (date): No

1b. Violations

Yes, if there have been permit violations; No, if there have not.

Sources (circle): Department of Environmental Protection; EPA Files  
Comment and other source (date): No

\*2. Facility Location

Select flood prone area, 100-year floodplain, or other. If floodplain information is unavailable, check "Other."

Sources (circle): Flood Insurance Study Maps.  
Comment and other source (date): 3

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A. Is there an observed release? (circle one)

Yes

No

Comments:

No information in the files reviewed on site reconnaissance indicate a release to surface water.

B. Likelihood of Release

1a. Is there a permitted outfall?  
(circle one)

Yes

No

1b. If so, have there been permit violations?  
(circle one)

Yes

No

2. Facility Location (check one):

- ☐ Flood prone area  
☐ 100-year flood plain  
☒ Other

Comments:

> 500 year floodplain

SURFACE WATER ROUTE  
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C. Route Characteristics

1. 24-hour Rainfall

Enter the 1-year, 24-hour rainfall. Refer to contour maps in Appendix D.

Sources (circle): See Appendix B.

Comment and other source (date): \_\_\_\_\_

\*2. Distance to Surface Water

Enter distance in miles. If surface water is discharged to a stream or river through a ditch, then, if the ditch always has water in it, use the distance to the ditch; if water in the ditch is intermittent, use the distance to the stream or river.

Sources (circle): USGS; Site Visit; GIS.

Comment and other source (date): (from PPE), #4

3. Physical State

Evaluate the physical state of the waste most likely to impact surface water in the event of a release. If there are multiple SWMUs, select the least stable physical state of the wastes on site:

stable solid

unstable solid

powder ash

liquid, gas, sludge

Sources (circle): 3007 Response; Site Visit.

Comment and other source (date): 1, 2



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C. Route Characteristics

1. 24-hour Rainfall (inches): 2.5
2. Distance to Surface Water (miles): 0.1
3. Physical State (check one):
  - ☐ Stable Solid (most stable)
  - ☐ Unstable Solid
  - ☒ Powder, Ash
  - ☒ Liquid, Gas, Sludge (least stable)

☐ ☒  
☐ ☒  
☒ ☐

Comments:

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4. Containment

Containment is a measure of the physical barriers in place to inhibit a waste from entering the surface water pathway. If there are multiple SWMUs, select the SWMU with the worst containment level.

Use the following criteria as guidelines (e.g., consider a lined lagoon with unbreached berms as a "sealed container"):

<u>Unit</u>	<u>Containment/Migration Potential</u>	<u>Score</u>
Sealed Container/Tank	Sound Secondary Containment	Very Good
Sealed Container/Tank	Unsound Secondary Containment	Good
Leaky Container/Tank	Sound Secondary Containment	Good
Underground Storage Tank	Tank Integrity Unknown	Good
Sealed Container/Tank	No Secondary Containment	Fair
Leaky Container/Tank	Unsound Secondary Containment	Fair
Leaky Container/Tank	No Secondary Containment	Poor
Land-based Unit		Poor
Contaminated Groundwater	Discharge to Surface Water	Poor
Contaminated Surface Soil	Runoff to Surface Water Likely	Poor

Unit scored (include description and dates in use); use *Worksheet #1*:

AOC #1, Barrel Storage Area

Sources (circle): Inspection Reports, 3007 Response: Site Visit.

Comment and other source (date):

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4. Containment (check one):

- ☐ Very Good
- ☐ Good
- ☒ Fair
- ☐ Poor

Comments:

The barrels were in good condition on a concrete floor, however, there was staining and no secondary containment.



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D. Waste Characteristics

1. Chemical Name and/or RCRA Waste Code Number

Enter the one chemical or waste code of most concern (for the surface water route) as defined by the chemical with the highest Sax toxicity rating, as found in Appendix A. Use *Worksheet #3* (on page 10 in groundwater section) to determine toxicity/persistence for each chemical of concern for the surface water route (included in *Worksheet #2*).

Sources (circle): For determining contaminants of concern: Site Visit, Surface Water/  
Sediment Analytical Data. For determining most toxic compound: See Appendix A.  
Comment and other source (date): 1, 2

2. Toxicity/Persistence

Value for the chemical or waste of concern. Refer to *Worksheet #3*.

Sources (circle): See Appendix A  
Comment and other source (date): \_\_\_\_\_

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D. Waste Characteristics

1. Chemical Name and/or RCRA Waste Code Number:

lead based powders (D008)

☒ ☐

2. Toxicity/Persistence Value (circle one):

0

3

6

9

12

15

18

☒ ☐

Comments:

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•3. Waste Quantity

Report units only if containment is other than "Very Good." If Containment is "VERY GOOD" for all units, waste quantity equals zero.

If quantity is known, convert data to a common unit, assume 1 ton = 1 cubic yard = 4 drums. For the purpose of converting bulk storage, assume 1 drum = 50 gallons. Enter waste quantity in cubic yards, tons or drums.

If quantity is unknown, estimate waste quantity using the following criteria:

< 10 yd <sup>3</sup> (or < 40 drums)	small
100 - 1,000 yd <sup>3</sup> (or 400 - 4,000 drums)	large
100 - 1,000 yd <sup>3</sup> (or > 4,000 drums)	large storage or disposal areas

If the site has multiple SWMUs, use combined waste quantities. Use *Worksheet #1* to assist in combining waste quantities. Generally, amount would be small for only contaminated groundwater discharging to surface water or if there is just a likelihood that contaminated soil is likely to reach surface water through surface runoff.

Sources (circle): Part A; Inspection Reports; 3007 Response; Annual Reports; Part B.  
Comment and other source (date): 1, 2



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3. Waste Quantity Known? (circle one)

Yes

No

If Yes, enter amount:

30-40 cubic yards or tons  
drums

If No, check one:

- ☐ Is amount likely to be small?
- ☐ Is amount likely to be large?
- ☐ Are large storage or disposal areas present?

Comments:

Up to 60 drums have been stored in the Barrel Storage Area  
This quantity does not include the combined 4,000 gallons of  
raw product oil stored in the above-ground tanks.

SURFACE WATER ROUTE  
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E. Targets

\*1. Type of Surface Water Use

Options are given in order from most critical (Drinking Water) to least critical. Check the most critical that applies. Check "Drinking Water" if surface water was previously used, is presently used, or is likely to be used in the future as drinking water. If drinking water use is not documented, check "Possible Drinking Water", unless specific information refutes this possibility.

If there is no information regarding the use of a river or stream, assume recreational use. Often, close recreational use is more likely to have an impact than a drinking water intake. If you can verify that none of the uses apply, then check:

Quality Impacted, if there is an observed release.

Quality Not Impacted, if there is no observed release.

Further distinguish depending on whether the distance to surface water is < 3 miles.

Sources (circle): GIS; Site Visit; Local Water Department.

Comment and other source (date):

#5

\*2. Distance to Intake or Contact Point

Distance from site to the point of surface water use (drinking water intake, recreation area, etc.). If there is no information on the use of a surface water body receiving a discharge from the facility, the distance to the contact point should be the distance from the facility to the nearest point of the surface water body. If discharge is through a ditch, use the distance to the stream, river, or water body, not the distance to the ditch.

Sources (circle): Hydrographic Atlas; GIS; Site Visit; Town Records.

Comment and other source (date):

#4 & #5

(from PPE)

\*3. Distance to Sensitive Environment

Enter the distance from the site to a sensitive environment along the surface water route. Sensitive environments include freshwater wetlands (greater than 2 acres), marshes, swamps, parks (national or state), and critical habitats of state and federal proposed and listed endangered species.

Sources (circle): GIS; State Department of Fisheries & Wildlife; USGS.

Comment and other source (date):

#6

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E. Targets

1. Type of Surface Water Use (check one):

☐ ☐

- ☐ Drinking Water
- ☐ Possible Drinking Water
- ☒ Recreation
- ☐ Agricultural or Industrial
- ☐ Quality Impacted
- ☐ Quality not Impacted (but within 3 miles)
- ☐ No Surface Water Bodies (within 3 miles)

2. Distance to the Intake or Contact Point (miles): 0.7

☐ ☒

3. Distance to Sensitive Environment (miles): 0.7

☐ ☒

Comments:

Selby Pond, a wetland, is located approximately  
0.7 miles east of Synthetic



AIR ROUTE  
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For the air pathway, site characteristics are considered to address the potential for release even if no release has been documented. But the air pathway differs somewhat from the groundwater and surface water routes in assessing containment. In the case of air releases, *current* conditions must be used in completing these forms to assess the likelihood of releases.

A. Observed Release

\*1. Is there an observed, unpermitted, ongoing release?

Yes, if there is a documented, unpermitted, ongoing release to the air route from a SWMU; or No, if there is not a documented release. Documentation may include analytical evidence, a report by a regulatory agency or by a facility employee stating that a release has occurred, or by indirect evidence. Do not score an observed release based on an isolated explosion or fire, but event should be noted in comments.

Sources (circle): Monitoring Reports, Inspection Reports, Site Visit, 3007 Response; TRI; Department of Environmental Protection.

Comment and other source (date): 1, 2

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A. Observed Release

1. Is there an observed, unpermitted, ongoing release?  
(circle one)

Yes

No

Comments:

No information in the files or from site visit to  
indicate a release to the air.

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B. Likelihood of Release

- \*1. Does the facility have an operating air permit?

Yes, if the facility has an operating permit; or No, if it does not.

Sources (circle): EPA; Department of Environmental Protection.

Comment and other source (date): NO

- \*2. Have there been any permit violations or odor complaints by residents?

Yes, if there have been permit violations or odor complaints; or No, if there have not.

Sources (circle): Department of Air Quality Control; EPA.

Comment and other source (date): NO

3. Can contaminants migrate into air?

Yes, if contaminant migration to air is possible; or No, if contaminant migration to air is not possible. See *Worksheet #4* for determining contaminants of concern for the air pathway.

Sources (circle): EPA; Versar document.

Comment and other source (date): 1, 2

- \*4. Containment (circle one):

Containment is a measure of the physical barriers in place to inhibit a waste from entering the air pathway. Interpret the descriptions in site reports or similar documents, using the following criteria as guidelines (for CURRENT conditions):

<u>Unit</u>	<u>Containment/Migration Potential</u>	<u>Score</u>
Closed Container/Tank	Inside Building	Very Good
Land-based Unit	Covered	Very Good
Storage Tank	Underground	Very Good
Closed Container/Tank	Open Area	Good
Open Container/Tank	Inside Building	Fair
Open Storage Tank	Underground	Fair
Open Container/Tank	Open Area	Poor
Land-based Unit	Open	Poor
Contaminated Surface Soil		Poor

If there are open drums, consider the entire set of drums in the storage area as open when scoring the containment. Outdoor wastewater treatment plant units are considered poor.

Unit scored (include description and dates in use); use *Worksheet #1*:

AOC #3, Kerosene Storage Area

Sources (circle): Site Visit, 3007 Response; Inspection Reports.

Comment and other source (date): \_\_\_\_\_

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**CONFIDENTIAL**



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B. Likelihood of Release

1. Does the facility have an operating air permit?  
(circle one)

Yes

No

☒ ☐

2. Have there been any permit violations or odor complaints by residents?  
(circle one)

Yes

No

☒ ☐

3. Can contaminants migrate into air?  
(circle one)

Yes

No

☒ ☐

4. Containment (circle one):

☐ Very Good

☐ Good

☒ Fair

☐ Poor

☐ ☒

Comments:

No information in files reviewed about permits, violations,  
or complaints. Staining on floor noted.

DRAFT  
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AIR ROUTE  
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Third Page

C. Waste Characteristics

1. Chemical Name and/or RCA Waste Code Number

Enter the one chemical or waste code of most concern (for the air route) as defined by the chemical with the highest Sax toxicity rating, as found in Appendix A. Use *Worksheet #4* to determine toxicity for each chemical of concern for the air route (included in *Worksheet #2*).

Sources (circle): For determining contaminants of concern: Site Visit, Soil Analytical Data; Permits. For determining most toxic compound: See Appendix A.  
Comment and other source (date): \_\_\_\_\_

2. Toxicity

Value for the chemical or waste of concern. Refer to *Worksheet #4*.

Sources (circle): See Appendix A.  
Comment and other source (date): \_\_\_\_\_

WORKSHEET #4  
Chemical Toxicity Values for Air Route

Identify and list each chemical at the site which has the potential to migrate to the air route. List the RCRA waste code and CAS number, if known. Obtain toxicity values from Appendix A for each chemical. Use the worksheet to select the chemical with the highest toxicity value (0-3) and enter its name and value in the Waste Characteristics section for the air route.

CAS #	Chemical Name and/or Waste Code	toxicity 0-3
	Lead-based powders (D008)	3
	lead oxide, cadmium, chromium	3
	Zinc	2
	Raw Product Oils	—
	Vinyl Silane	—

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C. Waste Characteristics

1. Chemical Name and/or RCRA Waste Code Number

Lead-based powder (D008)

2. Toxicity Value (circle one)

0      1      2      (3)

☒ ☐

Comments:

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\*3. Waste Quantity

The air route should be completed using *current* waste quantities and *current* containment conditions.

Report wastes only if Containment is other than "VERY GOOD." If Containment is "VERY GOOD" for all units, waste quantity equals zero.

If quantity is known, convert data to a common unit, assume 1 ton = 1 cubic yard = 4 drums. For the purpose of converting bulk storage, assume 1 drum = 50 gallons. Enter quantity in cubic yards, tons, or drums.

If quantity is unknown, estimate waste quantity using the following criteria:

< 10 yd <sup>3</sup> (or < 40 drums)	small
100 - 1,000 yd <sup>3</sup> (or 400 - 4,000 drums)	large
> 1,000 yd <sup>3</sup> (or > 4,000 drums)	large storage or disposal areas

If the site has multiple solid waste management units (SWMUs), use combined waste quantities. Use the amount of volatiles and particulates with containment values less than "VERY GOOD" to determine waste quantity for the air route. If the facility discharges to air, include the amount of waste released in determining waste quantity.

Sources (circle): Part A; Inspection Reports; 3007 Response.  
Comment and other source (date): \_\_\_\_\_

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3. Waste Quantity Known? (circle one)

Yes

No

If YES, enter actual amount:

\_\_\_\_\_ cubic yards or tons

1-2 drums

If No, check one:

- ☐ Is amount likely to be small?
- ☐ Is amount likely to be large?
- ☐ Are large storage or disposal areas present?

Comments:

Only 1-2 barrels of kerosene sludge per year generated  
from this AOC

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D. Targets

\*1. Population

Determine if residences, industries, and agriculture are located within 4 miles of the site. Residence indicates a single person or more. Check most critical item which applies.

Sources (circle): GIS; Site Visit; Local Planning Department.

Comment and other source (date): \_\_\_\_\_ )

\*2. Distance to Sensitive Environments?

Enter the nearest distance from the site to a sensitive environment in miles.  
Sensitive environment includes freshwater wetlands (greater than 2 acres), marshes, swamps, parks (national or state), and critical habitats of state and federal proposed and listed endangered species.

Sources (circle): GIS; State Department of Fisheries & Wildlife; USGS.

Comment and other source (date): \_\_\_\_\_ # 7

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D. Targets

1. Population (check one only) ☐ ☐

- ☒ Are residences located within 4 miles (most critical)?  
☐ Are other industries located within 4 miles?  
☐ Are agricultural lands located within 4 miles (least critical)?  
☐ Any other situation? Please comment:

2. Distance to Sensitive Environments (miles) 0.7 ☐ ☒

Comments:

Selby Pond is approximately 0.7 miles east of Synthetic  
Products

**ON-SITE ROUTE**  
**Instructions & Sources**  
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The on-site exposure pathway assesses the potential that people or sensitive environments will have direct physical contact with hazardous constituents or contaminated soil.

**A. Access to Site**

1. Is the site accessible to nearby residents?

Rate the accessibility as follows:

A 24-hour surveillance system or a barrier (fence, etc.) is in place with a means to control entry:

Score

Inaccessible

A less than 24-hour security guard but no barrier; OR a barrier but no separate means to control entry; OR a fence that is partially open:

Limited Access

No barrier and no security guard:

Unlimited Access

Sources (circle): Site Visit, Facility Inquiry.

Comment and other source (date): \_\_\_\_\_

**B. Observed Soil Contamination**

- \*1. Is there observed soil contamination?

Yes, if there is sampling information showing concentrations of contaminants greater than background; or No, if there is not a documented release to soil. If indirect evidence such as stressed vegetation, indicates a release, estimate Yes and comment. Do not score an observed release if contaminated soil is covered by 2 feet or more of clean soil or is covered by concrete or asphalt.

Sources (circle): Monitoring Reports; Site Visit; 3007 Response.

Comment and other source (date): \_\_\_\_\_ 1, 2



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A. Access to site

1. Rate the accessibility of the site (check one):

- ☐ Inaccessible  
☒ Limited access  
☐ Unlimited access

☒ ☐

Comments:

There is a fence on two sides of the property limiting access to the site. All hazardous wastes are stored inside the building and are therefore, inaccessible to the public.

B. Observed Soil Contamination

1. Is there observed soil contamination? (circle one):

Yes

No

☐ ☒

Comments:

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C. Containment

1. Containment is a measure of the physical barriers in place to inhibit a waste from entering the on-site pathway either now or in the past. Use the same containment factor selected in the Groundwater Route section:

<u>Unit</u>	<u>Containment/Migration Potential</u>	<u>Score</u>
Sealed Container/Tank	Sound Secondary Containment	Very Good
Sealed Container/Tank	Unsound Secondary Containment	Good
Leaky Container/Tank	Sound Secondary Containment	Good
Underground Storage Tank	Tank Integrity Unknown	Good
Sealed Container/Tank	No Secondary Containment	Fair
Leaky Container/Tank	Unsound Secondary Containment	Fair
Leaky Container/Tank	No Secondary Containment	Poor
Land-based Unit		Poor

Unit scored (include description and dates in use); use *Worksheet #1*:

AOC #1 Barrel Storage Area

Sources (circle): Investigation Reports, Site Visit, 3007 Response.

Comment and other source (date):

1, 2

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C. Containment:

1. Containment score (check one):

- ☐ Very Good  
☐ Good  
☒ Fair  
☐ Poor

☐ ☐

Comments:

The barrels appeared to be in good condition on a concrete floor, however there was no secondary containment & staining was noted.

ON-SITE ROUTE  
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D. Waste Characteristics

1. Chemical Name and/or Waste Code Number

Enter the one chemical or waste code of most concern (for the on-site route) as defined by the chemical with the highest Sax toxicity rating, as found in Appendix A. Use *Worksheet #5* to determine toxicity for each chemical for the on-site route (included in *Worksheet #2*).

Sources (circle): For determining contaminants of concern: Part A; Site Visit; Soil Analytical Data. For determining most toxic compound: See Appendix A.  
Comment and other source (date): 1, 2

2. Toxicity

Value for the chemical or waste of concern. Refer to *Worksheet #5*.

Sources (circle): See Appendix A.  
Comment and other source (date): \_\_\_\_\_

WORKSHEET #5  
Chemical Toxicity Value for On-Site Route

Identify and list each chemical at the site which has the potential to migrate to the on-site route. List the RCRA waste code and CAS number, if known. Obtain toxicity values from Appendix A for each chemical. Use the worksheet to select the chemical with the highest toxicity value (0-3) and enter its name and value in the Waste Characteristics section for the on-site route.

CAS #	Chemical Name and/or Waste Code	toxicity 0-3
	Lead-based powders (D008)	3
	Lead oxide, cadmium, chromium	3
	Zinc	2
	Raw Product Oil	—
	Vinyl Silane	—



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D. Waste Toxicity

1. Chemical Name and/or RCRA Waste Code Number:

Lead based powder (D008)

☒ ☐

2. Toxicity Value (circle one):

☒ ☐

0 1 2 3

Comments:

ON-SITE ROUTE  
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E. Targets

\*1. Distance to Residential Areas

Determine the distance to the nearest residence (in miles).

Sources (circle): GIS; USGS; GEMS; Local Planning Department; Area Maps.

Comment and other source (date): \_\_\_\_\_

\*2. On-Site Sensitive Environments

Yes, if there is a sensitive environment within facility boundaries or in areas with soil contamination due to facility operations; or No, if there is not a sensitive environment on-site. Sensitive environments include freshwater wetlands (greater than 2 acres), marshes, swamps, parks (national or state), and critical habitats of state and federal proposed and listed endangered species.

Sources (circle): GIS; State Department of Fisheries & Wildlife; USGS.

Comment and other source (date): \_\_\_\_\_ 1,6

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E. Targets

1. Distance to nearest residential area (miles): 0.1
2. Is there an on-site sensitive environment (circle one)?

Yes

No

☒ ☐  
☒ ☐

Comments:

The nearest residence is only about 25-30 feet west of the Synthetic building.